

Exhibit 23

IN THE UNITED STATES COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION MDL No. 2804  
Case No.  
17-mdl-2804  
Judge Dan Polster

This document relates to:  
The County of Cuyahoga, Ohio, et al., v.  
Purdue Pharma L.P., et al.,  
Case No. 1:17-OP-45004 (N.D. Ohio)

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Videotaped deposition of
DEREK SIEGLE
January 23, 2019
9:20 a.m.

Taken at:
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Wendy L. Klauss, RPR

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13 ALSO PRESENT:

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1 heroin that we are seeing through our task
2 forces and the amount of overdoses being
3 reported in the state.

4 Q. Are the employees of plaintiffs in
5 this case, Cuyahoga County and Summit County,
6 who are involved in Ohio HIDTA, have they been
7 referring to the problems they are having with
8 overdoses, is that heroin epidemic too?

9 A. I think they just call them
10 overdose, you know, problems, so many people
11 were overdosing.

12 Q. Is it fair to say that you yourself
13 have never used the phrase "opioid epidemic"
14 before?

15 A. I can't say that I have never used
16 it, but it's not a term I might say. You know,
17 I don't know if I've said that term or not.

18 Q. What drugs are involved in the
19 heroin epidemic?

20 A. Heroin, fentanyl, carfentanil, all
21 of the different analogs that they would keep
22 coming up with from fentanyl, any of the
23 prescription opioids, the all those categories
24 are included.

25 Q. So heroin epidemic would include

1 illicit street drugs -- it would include
2 illicit street drugs, correct?

3 A. It would include them, yes.

4 Q. Would you say that the majority of
5 the heroin epidemic involves illicit street
6 drugs?

7 A. I would say probably, yes.

8 Q. When did the heroin epidemic begin?

9 A. I'd have to go back and look
10 through some of our reports, and really, with
11 the seizures and things, and I said off the top
12 of my head I would believe about 2012, and we
13 saw it coming after some of the issues with the
14 prescription pill mills in Ohio, in particular
15 Southeastern Ohio, and then we pretty much knew
16 once the pills mills were shut down, that there
17 would be a heroin problem.

18 Q. What was the pill mill problem in
19 Southeast Ohio?

20 A. Many people were going, and again,
21 I have never been down there to see one, but
22 they were being in pain clinics, being
23 prescribe opioids, prescription opioids for
24 whatever their problem might be, and they had a
25 high rate of addiction and overdoses going on

1 in Southern Ohio.

2 Q. Around what time period would you
3 say those pill mill problems were occurring?

4 A. Were occurring?

5 Q. Yeah.

6 A. Probably sometime in the 2000s,
7 certainly were here when I got here in 2009,
8 until the state shut the pill mills down. I
9 think that was 2011 or so, there was some
10 legislation.

11 Q. Do you know what legislation that
12 was?

13 A. No. I don't remember. I would not
14 know the name of it or anything.

15 Q. Around that time, were there also
16 pill mills in Cuyahoga County and Summit
17 County?

18 A. I don't know.

19 Q. What's the basis of your knowledge
20 about pill mills?

21 A. Based on reports from the task
22 forces and, during that timeframe, we added two
23 counties in Southeast Ohio to Ohio HIDTA, Adams
24 County and Scioto County.

25 Q. I'm going to mark as Exhibit 3 a

1 document Bates stamped OH-HIDTA 003501.

2 - - - - -

3 (Thereupon, Deposition Exhibit 3,
4 Ohio HIDTA 2002 Threat Assessment,
5 Beginning with Bates label OH-HIDTA
6 0033501, was marked for purposes of
7 identification.)

8 - - - - -

9 Q. Do you recognize this document,
10 Mr. Siegel?

11 A. I do not. I mean, as far as I do
12 not recognize it. I can see what it is.

13 Q. What is this document?

14 A. It's the 2002 threat assessment
15 from the Ohio HIDTA.

16 Q. And can you remind me again what a
17 threat assessment is?

18 A. It describes what the threat, the
19 drug threat is in the Ohio HIDTA region at that
20 time and what drugs are prevalent and what is
21 being done, what drugs we are seizing, what the
22 task forces are working.

23 Q. And you used reporting from all of
24 the jurisdictions within Ohio HIDTA to prepare
25 that report, correct?